

This comment is being submitted on behalf of the Oregon Tualatin Valley Amateur Radio Club (OTVARC).

OTVARC opposes the imposition of the proposed \$50.00 application fee for the processing and issuance of Amateur Radio Service licenses as explained herein.

OTVARC is a general services club under the ARRL. We exist to share knowledge, provide education, and training on topics of interest to the amateur radio community.

We are a non-profit entity funded entirely by donations of funds from its members and the general public.

Our club sponsors and maintains a Radio Repeater site on two separate frequencies that is often used by various Search and Rescue groups, Clackamas County Oregon ARES groups, and local amateurs due to its good coverage of the natural areas to the south and west of Mt. Hood.

Another service we provide is to administer the license tests to those interested in obtaining or upgrading their amateur radio license. Our team of Volunteer Examiners are accredited through the ARRL-VEC. Many of the citizens who come to obtain their license do so because of their interest in serving the public good as members of their local ARES/RACES and CERT/NET groups.

CERT and ARES teams are trained to provide critical communications between city, county, and state governments when normal methods of communications fail. Extreme weather and earthquakes are examples of events where normal communications are expected to fail at least partially. All volunteer operators are required to hold individual licenses. From discussions we've had with newly licensed hams, many get their license solely to support their ARES or CERT team and an additional fee to get their license on top of the cost of a basic transceiver is more than many are willing to spend on what may just be a passing interest. This can hinder the ability of volunteer emergency groups such as ARES, to recruit new members and could very well negatively impact the future safety of our communities.

Amateur radio has a long-established history of such service, going back over a century in this country and world-wide. For much of its history, any license fees have been minimal at most, and for long stretches of time there were no license fees at all, in recognition of its contribution to education, training, and service of the licensees. Fees first imposed in the middle of the 1960s were dropped in recognition of this service, and indeed the remaining fees imposed for issuance of a special "vanity" license were later dropped because they did not cover the cost of processing their collection.

At present, the vast majority of the processing of Amateur Radio Service applications and license issuance is handled on a "paperless" basis with minimal interaction by Commission employees and the proposed application fee amount does not appear to be equitable.

Most holders of amateur radio licenses advance rather quickly through the license classes and many also apply for a vanity call sign. With three classes of licenses plus the vanity application, the fees can easily add up

to \$200 in one year for many amateurs and would be a disincentive to improve their skills and operating privileges.
THEREFORE, let the record show that OTVARC opposes imposition of the proposed Amateur Radio Service application fee.

Respectfully submitted by direction:

/s/ John D. Bucsek - KE7WNB

President, Oregon Tualatin Valley Amateur Radio Club (W70TV)
OTVARC Volunteer Examiner Team liaison, OTVARC ARRL-VEC Volunteer examiner team.